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17 *Secured Mail Solutions, LLC*

18 **UNITED STATES DISTRICT COURT**  
19 **CENTRAL DISTRICT OF CALIFORNIA**

20 SECURED MAIL SOLUTIONS, LLC,  
21  
22 Plaintiff,  
23  
24 v.  
25  
26 UNIVERSAL WILDE, INC.,  
27  
28 Defendant.

Case No.

**COMPLAINT FOR PATENT  
INFRINGEMENT, INJUNCTION, AND  
DAMAGES**

**DEMAND FOR JURY TRIAL**

Plaintiff, Secured Mail Solutions, LLC ("SMS"), alleges:

**JURISDICTION AND VENUE**

1. This Court has subject matter jurisdiction of this case under 28 U.S.C. §§ 1338(a), because this case arises under the patent laws of the United States, 35 U.S.C. §§ 1 *et seq.* Venue is proper in this district under 28 U.S.C. §§ 1391(b)-(c) and 1400(b) in that a substantial part of the events giving rise to the claims occurred in this district.

1 SMS is informed and believes, and on that basis alleges, that Defendant, Universal  
2 Wilde, Inc. (“UW”), has a regular and established practice of business in this district  
3 and has committed acts of infringement in this district.

#### 4 **THE PARTIES**

5 2. SMS is a limited liability company duly organized under the laws of the  
6 state of Nevada. SMS also does business in this judicial district.

7 3. SMS was founded by Todd Fitzsimmons to pursue the using and licensing  
8 of his inventions in the field of mail and mail information services and technology.  
9 Mr. Fitzsimmons’s inventions resulted in each of the seven United States patents that  
10 are asserted in this case.

11 3. SMS is informed and believes, and on that basis alleges, that Defendant  
12 UW is a corporation duly organized and existing under the laws of the state of  
13 Massachusetts, with its principal place of business at 26 Dartmouth Street, Westwood,  
14 MA 02090.

15 4. UW describes its business as “provid[ing] technology-enabled, data-  
16 driven marketing communication solutions from thought to distribution.” UW says on  
17 its website that its “full-service capabilities include offset and digital print – variable  
18 print and print-on-demand; direct mail services; automated fulfillment and distribution  
19 programs; and agency services.” UW further says that it “service[s] a wide range of  
20 industries including Financial Services, Healthcare, Pharmaceutical, Insurance,  
21 Education, Large Commercial and Retail.”

22 5. SMS alleges below that Defendant UW infringes numerous claims of  
23 SMS’s seven patents in suit.

#### 24 **SMS’S PATENTS AND UW’S INFRINGEMENT**

##### 25 **Overview**

26 6. Todd Fitzsimmons is an electrical engineer and a patent attorney who  
27 previously worked in the shipping and courier industry. After the September 11  
28 terrorist attacks, and the anthrax attacks via U.S. mail thereafter, Mr. Fitzsimmons

1 began developing new technologies to identify, track, and provide information on mail  
2 objects, such as letters and packages.

3 7. On October 16, 2001, Mr. Fitzsimmons filed a provisional patent  
4 application, followed by a non-provisional patent application on October 15, 2002, and  
5 an ongoing series of continuation applications thereafter. After years of examination  
6 by the United States Patent and Trademark Office, Mr. Fitzsimmons has received the  
7 following seven patents, all of which he has assigned to SMS:

<b>Patent Number</b>	<b>Title</b>	<b>Issued</b>	<b>Copy Attached to Complaint as</b>
7,814,032	SYSTEM AND METHOD FOR MAIL VERIFICATION	Oct. 12, 2010	Exhibit A
7,818,268	SYSTEM AND METHOD FOR MAIL VERIFICATION	Oct. 19, 2010	Exhibit B
8,073,787	SYSTEM AND METHOD FOR MAIL VERIFICATION	Dec. 6, 2011	Exhibit C
8,260,629	SYSTEM AND METHOD FOR PROVIDING AN ADVERTISEMENT TO A RECIPIENT OF A PHYSICAL MAIL OBJECT	Sept. 4, 2012	Exhibit D
8,429,093	SYSTEM AND METHOD FOR PROVIDING INFORMATION TO A RECIPIENT OF A PHYSICAL MAIL OBJECT	Apr. 23, 2013	Exhibit E
8,910,860	SYSTEMS AND METHOD FOR PROVIDING INFORMATION TO A RECIPIENT OF A PHYSICAL MAIL OBJECT	Dec. 16, 2014	Exhibit F
9,105,002	SYSTEM AND METHOD FOR PROVIDING INFORMATION TO A RECIPIENT OF A PHYSICAL MAIL OBJECT	Aug. 11, 2015	Exhibit G

8. These seven patents in suit disclose and claim various systems and methods for processing, verifying, or authenticating mail data. In some embodiments of the claimed inventions, mail data is affixed to a mail object and includes (or is linked to) information related to the mail object (for example, information on the sender of the mail object or the contents of the mail object). This information can then be used by various individuals or entities (for example, a mailing service, a mail carrier, or a recipient) to ensure that the mail object is secure and can safely be processed, routed and opened. In fact, the Patent Office granted special examination status to the application for U.S. Patent No. 7,818,268, because it related to “counter terrorism” technology that “reduces the risk of [a] terrorist attack.” In addition to ensuring safety and security of mail, mail data claimed in the patents in suit can be used by mailing services to more effectively process and route mail objects and can also be used by recipients to obtain additional information related to mail objects.

#### **Intelligent Mail Barcodes**

9. SMS’s patents in suit contain claims that cover technology used by UW in connection with what the United States Postal Service calls “Intelligent Mail Barcodes” (IMb’s). The Postal Service adopted IMb’s in 2009, long after Mr. Fitzsimmons invented the subject matters of the patents in suit and long after he filed his initial patent application in 2001. SMS’s patents containing claims related to IMb technology include U.S. Patents Nos. 7,814,032, 7,818,268, and 8,073,787 (collectively, the “IMb-Related Patents”).

10. One example of the IMb-Related Patents’ claims, and UW’s infringement of those patents, is provided by Claim 1 of U.S. Patent No. 7,818,268. That claim reads as follows (with bracketed letters added for reference):

1. A method of verifying mail identification data, comprising:
  - [a] affixing mail identification data to at least one mail object, said mail identification data comprising a single set of encoded data that includes at least a unique identifier, sender data, recipient data and shipping method data, wherein

1 said unique identifier consists of a numeric value assigned by a sender of said at  
 2 least one mail object;

3 **[b]** storing at least a verifying portion of said mail identification data;

4 **[c]** receiving by a computer at least an authenticating portion of said mail  
 5 identification data from at least one reception device via a network, wherein said  
 6 authenticating portion of said mail identification data comprises at least said  
 7 sender data and said shipping method data; and

8 **[d]** providing by said computer mail verification data via said network when  
 9 said authenticating portion of said mail identification data corresponds with said  
 10 verifying portion of said mail identification data.

11 11. UW's own public documents and publications of the U.S. Postal Service  
 12 show that UW is making, using, selling, and offering for sale a system and method for  
 13 generating, storing, and processing mail identification data that infringes multiple  
 14 claims of the IMb-Related Patents. For example, UW uses software and hardware  
 15 ("IMb-Related Products") to generate various barcodes, including the Intelligent Mail  
 16 barcode. The IMb-Related Products are then used to affix IMb's on mail objects and  
 17 to store at least portions of the IMb's (together with related information) in a storage  
 18 device. The IMb-Related Products are then used to interrogate the stored information,  
 19 resulting in the communication of data (including verification data) over a network.

20 12. Comparing the operation of UW's IMb-Related Products to Claim 1 of the  
 21 '268 Patent, SMS is informed and believes, and on that basis alleges, that these  
 22 products are used to perform all the steps of the patented method, including:

23 **[a]** affixing mail identification data (an IMb) to at least one mail object,  
 24 where the IMb is a single set of encoded data that includes at least a unique  
 25 identifier (a serial number), sender data (a mailer identifier), recipient data (a  
 26 delivery point ZIP code), and shipping method data (a service type identifier),  
 27 wherein the unique identifier (serial number) consists of a numeric value  
 28 assigned by a sender of the mail object;

1       **[b]** storing a verifying portion of the IMb;

2       **[c]** receiving an authenticating portion of the IMb from a reception device  
3 (for example, from a device operated by the USPS), wherein the second portion  
4 of the IMb includes at least sender data (the mailer identifier) and shipping  
5 method data (the service type identifier); and

6       **[d]** providing information on the mail object (such as mail verification data)  
7 when the authenticating portion of the IMb (the portion received from USPS)  
8 corresponds with the verifying portion of the IMb (the portion stored by UW).

9       13. SMS is informed and believes, and on that basis alleges, that UW directly  
10 uses the IMb-Related Products as described above, and UW is therefore directly  
11 infringing the IMb-Related Patents. SMS is also informed and believes, and on that  
12 basis alleges, that UW induces others to infringe the IMb-Related Patents and  
13 contributes to such infringement by others—for example, mail recipients, customers, or  
14 partners.

15       14. Evidence of such direct and indirect infringement can be found on UW’s  
16 website, which says that UW offers “two levels of Intelligent Mail barcode service,  
17 Basic and Full,” and that, “[w]ith Full Service, mail delivery status is tracked.” UW  
18 says that its “[c]ustomer service teams can use real-time delivery knowledge to  
19 respond to customer calls, to update anxious customers on when outbound mail will  
20 arrive, or to see if the inbound check really is ‘in the mail.’” UW says that it has “the  
21 software and the expertise to help,” to generate “Standard and Customized Reporting”  
22 and to provide “Advanced Mail Tracking.” Corresponding U.S. Postal Service  
23 specifications and user guides confirm that these services provided by UW entail the  
24 use of methods and products covered by SMS’s IMb-Related Patents.

25       15. UW has been aware of the IMb-Related Patents and of SMS’s contention  
26 that UW is directly and indirectly infringing them since at least August 18, 2015, but  
27 UW continues to use the IMb-Related Products to infringe the Asserted Patents.  
28

1           16. On August 17, 2015, counsel for SMS sent a letter to UW identifying the  
 2 patents in suit and the infringing activities of UW. A true and correct copy of this  
 3 letter, which was delivered to UW on August 18, 2015, is Exhibit H to this Complaint.  
 4 This letter notified UW that it was “making, using, selling, and offering for sale a  
 5 system and method for generating, storing, and processing mail identification data that  
 6 infringes multiple claims of the IMb-Related Patents under 35 U.S.C. Section 271. For  
 7 example, Universal Wilde uses software and hardware (‘IMB-Related Products’) to  
 8 generate various barcodes, including the Intelligent Mail barcode (‘IMb’). The IMb-  
 9 Related Products are then used to affix IMbs on mail objects and to store at least  
 10 portions of the IMbs (together with related information) in a storage device. The IMb-  
 11 Related Products are then used to interrogate the stored information, resulting in the  
 12 communication of data (including verification data) over a network.”

### 13                           **Personalized Quick Response Codes**

14           17. SMS’s patents in suit contain claims that cover technology used by UW in  
 15 connection with personalized quick response (QR) codes. The mail industry’s use of  
 16 QR codes began in 2007, long after Todd Fitzsimmons invented the subject matters of  
 17 the patents in suit and long after he filed his initial patent application in 2001. SMS’s  
 18 patents containing claims related to QR code technology include U.S. Patents Nos.  
 19 8,260,629 and 8,429,093 (collectively, the “QR-Related Patents”).

20           18. One example of the QR-Related Patents’ claims, and UW’s infringement  
 21 of those patents, is provided by Claim 1 of U.S. Patent No. 8,429,093. That claim  
 22 reads as follows (with bracketed letters added for reference):

23           1. A method for providing electronic data to a recipient of a mail object,  
 24 comprising:

25           **[a]** Generating, by a processor, a barcode for a mail object, said barcode  
 26 including at least a first set of mail data, said first set of mail data including data  
 27 corresponding to said recipient of said mail object;

28           **[b]** affixing said barcode to said mail object;



1        **[c]**    submitting said mail object to a mail carrier for delivery to said recipient  
2        of said mail object;

3        **[d]**    receiving said first set of mail data, including data corresponding to said  
4        recipient of said mail object, from a reception device of said recipient via a  
5        network;

6        **[e]**    providing said electronic data to said reception device via said network in  
7        response to receiving said first set of mail data, said electronic data including a  
8        content of said mail object;

9        **[f]**    wherein said reception device displays said electronic data to a recipient  
10       of said mail object by displaying said electronic data on a screen of said  
11       reception device.

12       19.    UW's own public documents show that UW is making, using, selling, and  
13       offering for sale a system and method for generating, affixing, and processing mail  
14       data that infringes multiple claims of SMS's QR-Related Patents. For example, UW  
15       uses hardware and software ("QR-Related Products") to generate personalized (or  
16       variable) QR codes. The QR-Related Products are then used to affix each personalized  
17       QR code onto a mail object and store related electronic data in a storage device. Then,  
18       the QR-Related Products are used to provide the related electronic data to a reception  
19       device (such as a smart phone or tablet) in response to the reception device scanning  
20       the personalized QR code on the mail object.

21       20.    Comparing the operation of UW's QR-Related Products to Claim 1 of the  
22       '093 Patent, SMS is informed and believes, and on that basis alleges, that these  
23       products are used to perform all the steps of the patented method, including:

24       **[a]**    generating a barcode that includes data corresponding to a recipient of a  
25       mail object (the QR code, with a personalized network location corresponding to  
26       a recipient of a mail object),

27       **[b]**    affixing the QR code on the mail object (such as a letter or package),

28       **[c]**    submitting the mail object to a mail carrier (the USPS) for delivery to the



1 recipient,

2 **[d]** receiving the data corresponding to a recipient of a mail object (the QR  
3 code) via a network (for example, the Internet) from a reception device (such as  
4 a smart phone or tablet) operated by the recipient, and

5 **[e]** providing electronic data to the reception device via the network in  
6 response to receiving the QR code, said electronic data including a content of the  
7 mail object (for example, references to the recipient and subject matter of the  
8 mail),

9 **[f]** wherein said reception device displays the data to a recipient by  
10 displaying it on a screen of the reception device (such as the screen of a smart  
11 phone or tablet).

12 21. SMS is informed and believes, and on that basis alleges, that UW directly  
13 uses the QR-Related Products as described above, and UW is therefore directly  
14 infringing the QR-Related Patents. SMS is also informed and believes, and on that  
15 basis alleges, that UW induces others to infringe the QR-Related Patents and  
16 contributes to such infringement by others—for example, mail recipients, customers, or  
17 partners. UW does this, for example, by inducing customers and mail recipients to  
18 participate in a personalized QR code program (for example, inducing customers to  
19 store the electronic data in a storage device and provide the electronic data to the  
20 reception device, and inducing recipients to scan the personalized QR codes).

21 22. Evidence of such direct and indirect infringement can be found on UW's  
22 website, which says that UW's "[v]ariable 2D codes [are] interactive codes [that] can  
23 contain links that automatically send users to a specific website" and can be used to  
24 provide "[p]roduct traceability when combined with variable data." UW's website  
25 further says that "Universal Wilde can produce QR codes for inclusion on personalized  
26 print" and "can produce QR codes for unique or general URLs." The website says that  
27 "[a]dding QR codes to printed materials means one more avenue Universal Wilde can  
28 use to provide value. It's another way we help you achieve a better return on

1 investment for your marketing dollars.”

2 23. UW has been aware of the QR-Related Patents and of SMS’s contention  
3 that UW is directly and indirectly infringing them since at least August 18, 2015, but  
4 UW continues to use the QR-Related Products to infringe the Asserted Patents.

5 24. On August 17, 2015, counsel for SMS sent a letter to UW (Exhibit H to  
6 this Complaint) identifying the patents in suit and the infringing activities of UW. This  
7 letter notified UW that it was “making, using, selling, and offering for sale a system  
8 and method for generating, affixing, and processing mail data that infringes multiple  
9 claims of SMS’s QR-Related Patents. For example, Universal Wilde uses software  
10 and hardware (‘QR-Related Products’) to generate personalized (or variable) quick  
11 response (‘QR’) codes. The QR-Related Products are then used to affix each  
12 personalized QR code onto a mail object and store related electronic data in a storage  
13 device. The QR-Related Products are then used to provide the related electronic data  
14 to a reception device (such as a smart phone or tablet) in response to the reception  
15 device scanning the personalized QR code on the mail object.”

16 **Personalized Universal Resource Locators**

17 25. SMS’s patents in suit contain claims that cover technology used by UW  
18 in connection with personalized uniform resource locators (pURLs). The mail  
19 industry’s use of pURLs began long after Todd Fitzsimmons invented the subject  
20 matters of the patents in suit and long after he filed his initial patent application in  
21 2001. SMS’s patents containing claims related to pURL technology include U.S.  
22 Patents Nos. 8,910,860 and 9,105,002 (collectively, the “pURL-Related Patents”).

23 26. One example of the pURL-Related Patents’ claims, and UW’s  
24 infringement of those patents, is provided by Claim 1 of U.S. Patent No. 9,105,002.  
25 That claim reads as follows (with bracketed letters added for reference):

26 1. A method for providing electronic data to a recipient of a mail object,  
27 comprising:

28 [a] using an output device to affix a single set of mail ID data to said mail

1 object, said single set of mail ID data including at least recipient data, said  
2 recipient data comprising a personalized network address associated with said  
3 recipient of said mail object;

4 **[b]** submitting said mail object to a mail carrier for delivery to said recipient  
5 of said mail object;

6 **[c]** receiving said recipient data from a reception device of said recipient via a  
7 network; and

8 **[d]** providing by at least one processor said electronic data to said reception  
9 device via said network in response to receiving said recipient data, said  
10 electronic data comprising a sender's web page that identifies said recipient of  
11 said mail object and includes data corresponding to a content of said mail object;

12 **[e]** wherein said electronic data is configured to be displayed to said recipient  
13 via a web browser on a display of said reception device.

14 27. UW's own public documents show that UW is making, using, selling, and  
15 offering for sale a system and method for generating, affixing, and processing mail  
16 data that infringes multiple claims of SMS's pURL-Related Patents. For example, UW  
17 uses hardware and software ("pURL-Related Products") to generate variable data,  
18 including pURLs. The pURL-Related Products are then used to affix each pURL onto  
19 a mail object and store related electronic data in a storage device. The pURL-Related  
20 Products are also used to provide the related electronic data to a reception device (such  
21 as a smart phone, tablet, or computer) in response to entry of the pURL into the  
22 reception device.

23 28. Comparing the operation of UW's pURL-Related Products to Claim 1 of  
24 the '002 Patent, SMS is informed and believes, and on that basis alleges, that these  
25 products are used to perform all the steps of the patented method, including:

26 **[a]** using an output device (such as a printer) to affix to a mail object (such as  
27 a letter or package) a single set of mail ID data (a Uniform Resource Locator, or  
28 "URL") that includes recipient data including a personalized network address

1 (“pURL”) associated with a recipient of a mail object,  
2 **[b]** submitting the mail object to a mail carrier (such as the U.S. Postal  
3 Service) for delivery to the recipient,  
4 **[c]** receiving recipient data from a reception device (such as a smart phone,  
5 tablet, or computer) as part of a request for electronic data associated with the  
6 personalized network location, and  
7 **[d]** providing the electronic data, using a processor such as a computer, to the  
8 reception device,  
9 **[e]** wherein the electronic data (such as the contents of a web page) includes  
10 data on a content of the mail object (such as references to the recipient and  
11 subject matter of the mail) and is configured to be displayed via a web browser  
12 on a screen of the reception device (such as the screen of a smart phone, tablet,  
13 or computer).

14 29. SMS is informed and believes, and on that basis alleges, that UW directly  
15 uses the pURL-Related Products as described above, and UW is therefore directly  
16 infringing the pURL-Related Patents. SMS is also informed and believes, and on that  
17 basis alleges, that UW induces others to infringe the pURL-Related Patents and  
18 contributes to such infringement by others—for example, mail recipients, customers, or  
19 partners. UW does this, for example, by inducing customers and recipients to  
20 participate in a pURL program (such as by inducing customers to store the electronic  
21 data in a storage device and provide the electronic data to the reception device, and  
22 inducing recipients to enter the pURL into a reception device).

23 30. Evidence of such direct and indirect infringement can be found on UW’s  
24 website, which says, “Universal Wilde, through our Xccelerate system, can offer  
25 personalized websites to capture direct mail or email responses. As an alternative to a  
26 BRC, a Personalized URL (PURL), an invitation-only marketing website, allows  
27 immediate collection of responses from a campaign.” UW’s website further says that  
28 “[t]hese sites are convenient to use and can be personalized for the user with images

1 and text. ... With PURLs you can deliver different products and offers based on the  
2 individual responder, helping you target response more effectively.” According to the  
3 website, “The resulting PURL is hosted on-line by Xccelerate. Web links are  
4 generated by merging the contacts name and the customer-supplied web address. The  
5 name in the address (SamSmith.youraddress.com) identifies who is visiting the site,  
6 triggering the keywords to personalize the page.” UW tells customers that they can  
7 “[c]ombine Xccelerate PURL technology with your direct mail strategy to create  
8 effective marketing that maximizes your marketing dollars and improves your ROI.”

9 31. UW has been aware of the pURL-Related Patents and of SMS’s  
10 contention that UW is directly and indirectly infringing them since at least August 18,  
11 2015, but UW continues to use the pURL-Related Products to infringe the Asserted  
12 Patents.

13 32. On August 17, 2015, counsel for SMS sent a letter to UW (Exhibit H to  
14 this Complaint) identifying the patents in suit and the infringing activities of UW. This  
15 letter notified UW that it was “making, using, selling, and offering for sale a system  
16 and method for generating, affixing, and processing mail data that infringes multiple  
17 claims of SMS’s pURL-Related Patents. For example, Universal Wilde is using  
18 certain hardware and software (‘pURL-Related Products’) to generate variable data,  
19 including personalized Universal Resource Locators (‘pURLs’). The pURL-Related  
20 Products are then used to affix each pURL onto a mail object and store related  
21 electronic data in a storage device. The pURL-Related Products are also used to  
22 provide the related electronic data to a reception device (such as a smart phone, tablet,  
23 or computer) in response to entry of the pURL into the reception device.”

24 ///

25 ///

26 ///

**FIRST CLAIM FOR RELIEF**

**(Infringement of U.S. Patent No. 7,814,032)**

33. SMS repeats and realleges the allegations of Paragraphs 1-32 as if fully set forth here.

34. On October 12, 2010, United States Patent No. 7,814,032 (“the ’032 Patent”) was duly and legally issued, entitled “System and Method for Mail Verification.” SMS was assigned the ’032 Patent and continues to hold all rights, title, and interest in and to the ’032 Patent, including, without limitation, all causes of action and enforcement rights and all rights to seek and obtain any remedies of any kind for past, current, and future infringement of the patent, including injunctive relief and the right to sue for past damages. A true and correct copy of the ’032 Patent is Exhibit A to this Complaint.

35. UW has directly infringed, is currently directly infringing, and, on information and belief will continue to directly infringe one or more claims of the ’032 Patent by making, using, offering to sell, and selling within the United States, or importing into the United States, the IMb-Related Products.

36. SMS is informed and believes, and on that basis alleges, that UW has actively induced and encouraged and currently is actively inducing and encouraging infringement of the ’032 Patent. SMS is informed and believes, and on that basis alleges, that the ’032 Patent has been directly infringed, is currently being directly infringed, and will continue to be directly infringed within the United States – including, on information and belief, within this district – by UW's customers using the IMb-Related Products. SMS is informed and believes, and on that basis alleges, that UW actively encourages that infringement by advertising, promoting and instructing its customers in the use of these products in a manner that directly infringes the ’032 Patent. On information and belief, UW has actively induced and encouraged, or will continue to actively induce and encourage, its customers' use of these products in a manner that directly infringes the ’032 Patent with specific intent to induce and

1 encourage such infringement, or at a minimum with willful blindness to the known risk  
2 of such infringement.

3 37. SMS is informed and believes, and on that basis alleges, that UW has  
4 contributed and is currently contributing to the infringement of the '032 Patent by  
5 selling, offering to sell, supplying, maintaining, and supporting IMb-Related Products  
6 that directly infringe the '032 Patent when used by UW's customers and their  
7 transaction partners. SMS is informed and believes, and on that basis alleges, that the  
8 '032 Patent has been directly infringed, is currently being directly infringed, and will  
9 continue to be directly infringed within the United States – including, on information  
10 and belief, within this district – by others, including UW's customers using IMb-  
11 Related Products, mail recipients, and partners. These products are especially made or  
12 adapted for infringing use, and they are not staple articles or commodities of commerce  
13 suitable for substantial non-infringing use. On information and belief, UW has  
14 contributed, and will continue to contribute, to infringement of the '032 Patent with the  
15 knowledge that the systems and methods for which its products were especially made  
16 infringe the '032 Patent.

17 38. SMS is informed and believes, and on that basis alleges, that the claims  
18 directly or indirectly infringed by UW include, without limitation, Claims 1-4, 8-15,  
19 and 19-22 of the '032 Patent.

20 39. As a direct and proximate consequence of UW's infringement of the '032  
21 Patent, SMS has suffered and will continue to suffer damages, in an amount not yet  
22 determined, as well as irreparable injury for which it has no adequate remedy at law.  
23 SMS is entitled to damages from UW as well as preliminary and permanent injunctive  
24 relief against further infringement of the '032 Patent.

25 40. UW has had actual notice of the '032 Patent and SMS's infringement  
26 contentions since at least August 18, 2015, but, despite such notice, has continued to  
27 infringe the '032 Patent. SMS is informed and believes, and on that basis alleges, that  
28 UW's infringement is willful and warrants treble damages or other enhanced damages



1 as well as an award of SMS's attorneys' fees and litigation expenses.

2 **SECOND CLAIM FOR RELIEF**

3 **(Infringement of U.S. Patent No. 7,818,268)**

4 41. SMS repeats and realleges the allegations of Paragraphs 1-32 as if fully  
5 set forth here.

6 42. On October 19, 2010, United States Patent No. 7,818,268 ("the '268  
7 Patent") was duly and legally issued, entitled "System and Method for Mail  
8 Verification." SMS was assigned the '268 Patent and continues to hold all rights, title,  
9 and interest in and to the '268 Patent, including, without limitation, all causes of action  
10 and enforcement rights and all rights to seek and obtain any remedies of any kind for  
11 past, current, and future infringement of the patent, including injunctive relief and the  
12 right to sue for past damages. A true and correct copy of the '268 Patent is Exhibit B  
13 to this Complaint.

14 43. UW has directly infringed, is currently directly infringing, and, on  
15 information and belief will continue to directly infringe one or more claims of the '268  
16 Patent by making, using, offering to sell, and selling within the United States, or  
17 importing into the United States, the IMb-Related Products.

18 44. SMS is informed and believes, and on that basis alleges, that UW has  
19 actively induced and encouraged and currently is actively inducing and encouraging  
20 infringement of the '268 Patent. SMS is informed and believes, and on that basis  
21 alleges, that the '268 Patent has been directly infringed, is currently being directly  
22 infringed, and will continue to be directly infringed within the United States –  
23 including, on information and belief, within this district – by UW's customers using the  
24 IMb-Related Products. SMS is informed and believes, and on that basis alleges, that  
25 UW actively encourages that infringement by advertising, promoting and instructing its  
26 customers in the use of these products in a manner that directly infringes the '268  
27 Patent. On information and belief, UW has actively induced and encouraged, or will  
28 continue to actively induce and encourage, its customers' use of these products in a

1 manner that directly infringes the '268 Patent with specific intent to induce and  
2 encourage such infringement, or at a minimum with willful blindness to the known risk  
3 of such infringement.

4 45. SMS is informed and believes, and on that basis alleges, that UW has  
5 contributed and is currently contributing to the infringement of the '268 Patent by  
6 selling, offering to sell, supplying, maintaining, and supporting IMb-Related Products  
7 that directly infringe the '268 Patent when used by UW's customers and their  
8 transaction partners. SMS is informed and believes, and on that basis alleges, that the  
9 '268 Patent has been directly infringed, is currently being directly infringed, and will  
10 continue to be directly infringed within the United States – including, on information  
11 and belief, within this district – by others, including UW's customers using IMb-  
12 Related Products, mail recipients, and partners. These products are especially made or  
13 adapted for infringing use, and they are not staple articles or commodities of commerce  
14 suitable for substantial non-infringing use. On information and belief, UW has  
15 contributed, and will continue to contribute, to infringement of the '268 Patent with the  
16 knowledge that the systems and methods for which its products were especially made  
17 infringe the '268 Patent.

18 46. SMS is informed and believes, and on that basis alleges, that the claims  
19 directly or indirectly infringed by UW include, without limitation, Claims 1-3, 5-12,  
20 16, 33-36, 39-42, and 44-45 of the '268 Patent.

21 47. As a direct and proximate consequence of UW's infringement of the '268  
22 Patent, SMS has suffered and will continue to suffer damages, in an amount not yet  
23 determined, as well as irreparable injury for which it has no adequate remedy at law.  
24 SMS is entitled to damages from UW as well as preliminary and permanent injunctive  
25 relief against further infringement of the '268 Patent.

26 48. UW has had actual notice of the '268 Patent and SMS's infringement  
27 contentions since at least August 18, 2015, but, despite such notice, has continued to  
28 infringe the '268 Patent. SMS is informed and believes, and on that basis alleges, that

1 UW's infringement and warrants treble damages or other enhanced damages as well as  
 2 an award of SMS's attorneys' fees and litigation expenses.

3 **THIRD CLAIM FOR RELIEF**

4 **(Infringement of U.S. Patent No. 8,073,787)**

5 49. SMS repeats and realleges the allegations of Paragraphs 1-32 as if fully  
 6 set forth here.

7 50. On December 6, 2011, United States Patent No. 8,073,787 ("the '787  
 8 Patent") was duly and legally issued, entitled "System and Method for Mail  
 9 Verification." SMS was assigned the '787 Patent and continues to hold all rights, title,  
 10 and interest in and to the '787 Patent, including, without limitation, all causes of action  
 11 and enforcement rights and all rights to seek and obtain any remedies of any kind for  
 12 past, current, and future infringement of the patent, including injunctive relief and the  
 13 right to sue for past damages. A true and correct copy of the '787 Patent is Exhibit C  
 14 to this Complaint.

15 51. UW has directly infringed, is currently directly infringing, and, on  
 16 information and belief will continue to directly infringe one or more claims of the '787  
 17 Patent by making, using, offering to sell, and selling within the United States, or  
 18 importing into the United States, the IMb-Related Products.

19 52. SMS is informed and believes, and on that basis alleges, that UW has  
 20 actively induced and encouraged and currently is actively inducing and encouraging  
 21 infringement of the '787 Patent. SMS is informed and believes, and on that basis  
 22 alleges, that the '787 Patent has been directly infringed, is currently being directly  
 23 infringed, and will continue to be directly infringed within the United States –  
 24 including, on information and belief, within this district – by UW's customers using the  
 25 IMb-Related Products. SMS is informed and believes, and on that basis alleges, that  
 26 UW actively encourages that infringement by advertising, promoting and instructing its  
 27 customers in the use of these products in a manner that directly infringes the '787  
 28 Patent. On information and belief, UW has actively induced and encouraged, or will

1 continue to actively induce and encourage, its customers' use of these products in a  
2 manner that directly infringes the '787 Patent with specific intent to induce and  
3 encourage such infringement, or at a minimum with willful blindness to the known risk  
4 of such infringement.

5 53. SMS is informed and believes, and on that basis alleges, that UW has  
6 contributed and is currently contributing to the infringement of the '787 Patent by  
7 selling, offering to sell, supplying, maintaining, and supporting IMb-Related Products  
8 that directly infringe the '787 Patent when used by UW's customers and their  
9 transaction partners. SMS is informed and believes, and on that basis alleges, that the  
10 '787 Patent has been directly infringed, is currently being directly infringed, and will  
11 continue to be directly infringed within the United States – including, on information  
12 and belief, within this district – by others, including UW's customers using IMb-  
13 Related Products, mail recipients, and partners. These products are especially made or  
14 adapted for infringing use, and they are not staple articles or commodities of commerce  
15 suitable for substantial non-infringing use. On information and belief, UW has  
16 contributed, and will continue to contribute, to infringement of the '787 Patent with the  
17 knowledge that the systems and methods for which its products were especially made  
18 infringe the '787 Patent.

19 54. SMS is informed and believes, and on that basis alleges, that the claims  
20 directly or indirectly infringed by UW include, without limitation, Claims 1-6, 13, 30-  
21 32, 34, 35, and 41-49 of the '787 Patent.

22 55. As a direct and proximate consequence of UW's infringement of the '787  
23 Patent, SMS has suffered and will continue to suffer damages, in an amount not yet  
24 determined, as well as irreparable injury for which it has no adequate remedy at law.  
25 SMS is entitled to damages from UW as well as preliminary and permanent injunctive  
26 relief against further infringement of the '787 Patent.

27 56. UW has had actual notice of the '787 Patent and SMS's infringement  
28 contentions since at least August 18, 2015, but, despite such notice, has continued to

1 infringe the '787 Patent. SMS is informed and believes, and on that basis alleges, that  
 2 UW's infringement warrants treble damages or other enhanced damages as well as  
 3 an award of SMS's attorneys' fees and litigation expenses.

#### 4 **FOURTH CLAIM FOR RELIEF**

#### 5 **(Infringement of U.S. Patent No. 8,260,629)**

6 57. SMS repeats and realleges the allegations of Paragraphs 1-32 as if fully  
 7 set forth here.

8 58. On September 4, 2012, United States Patent No. 8,260,629 ("the '629  
 9 Patent") was duly and legally issued for an invention entitled "System and Method for  
 10 Providing an Advertisement to a Recipient of a Physical Mail Object." SMS was  
 11 assigned the '629 Patent and continues to hold all rights, title, and interest in and to the  
 12 '629 Patent, including, without limitation, all causes of action and enforcement rights  
 13 and all rights to seek and obtain any remedies of any kind for past, current, and future  
 14 infringement of the patent, including injunctive relief and the right to sue for past  
 15 damages. A true and correct copy of the '629 Patent is Exhibit D to this Complaint.

16 59. UW has directly infringed, is currently directly infringing, and, on  
 17 information and belief will continue to directly infringe one or more claims of the '629  
 18 Patent by making, using, offering to sell, and selling within the United States, or  
 19 importing into the United States, the QR-Related Products.

20 60. SMS is informed and believes, and on that basis alleges, that UW has  
 21 actively induced and encouraged and currently is actively inducing and encouraging  
 22 infringement of the '629 Patent. SMS is informed and believes, and on that basis  
 23 alleges, that the '629 Patent has been directly infringed, is currently being directly  
 24 infringed, and will continue to be directly infringed within the United States –  
 25 including, on information and belief, within this district – by UW's customers using the  
 26 QR-Related Products. SMS is informed and believes, and on that basis alleges, that  
 27 UW actively encourages that infringement by advertising, promoting and instructing its  
 28 customers in the use of these products in a manner that directly infringes the '629

1 Patent. On information and belief, UW has actively induced and encouraged, or will  
2 continue to actively induce and encourage, its customers' use of these products in a  
3 manner that directly infringes the '629 Patent with specific intent to induce and  
4 encourage such infringement, or at a minimum with willful blindness to the known risk  
5 of such infringement.

6 61. SMS is informed and believes, and on that basis alleges, that UW has  
7 contributed and is currently contributing to the infringement of the '629 Patent by  
8 selling, offering to sell, supplying, maintaining, and supporting QR-Related Products  
9 that directly infringe the '629 Patent when used by UW's customers and their  
10 transaction partners. SMS is informed and believes, and on that basis alleges, that the  
11 '629 Patent has been directly infringed, is currently being directly infringed, and will  
12 continue to be directly infringed within the United States – including, on information  
13 and belief, within this district – by others, including UW's customers using QR-  
14 Related Products, mail recipients, and partners. These products are especially made or  
15 adapted for infringing use, and they are not staple articles or commodities of commerce  
16 suitable for substantial non-infringing use. On information and belief, UW has  
17 contributed, and will continue to contribute, to infringement of the '629 Patent with the  
18 knowledge that the systems and methods for which its products were especially made  
19 infringe the '629 Patent.

20 62. SMS is informed and believes, and on that basis alleges, that the claims  
21 directly or indirectly infringed by UW include, without limitation, Claims 1, 3-5, 10,  
22 12, and 17-19 of the '629 Patent.

23 63. As a direct and proximate consequence of UW's infringement of the '629  
24 Patent, SMS has suffered and will continue to suffer damages, in an amount not yet  
25 determined, as well as irreparable injury for which it has no adequate remedy at law.  
26 SMS is entitled to damages from UW as well as preliminary and permanent injunctive  
27 relief against further infringement of the '629 Patent.  
28



64. UW has had actual notice of the '629 Patent and SMS's infringement contentions since at least August 18, 2015, but, despite such notice, has continued to infringe the '629 Patent. SMS is informed and believes, and on that basis alleges, that UW's infringement warrants treble damages or other enhanced damages as well as an award of SMS's attorneys' fees and litigation expenses.

#### **FIFTH CLAIM FOR RELIEF**

#### **(Infringement of U.S. Patent No. 8,429,093)**

65. SMS repeats and realleges the allegations of Paragraphs 1-32 as if fully set forth here.

66. On April 23, 2013, United States Patent No. 8,429,093 ("the '093 Patent") was duly and legally issued, entitled "System and Method for Providing Information to a Recipient of a Physical Mail Object." SMS was assigned the '093 Patent and continues to hold all rights, title, and interest in and to the '093 Patent, including, without limitation, all causes of action and enforcement rights and all rights to seek and obtain any remedies of any kind for past, current, and future infringement of the patent, including injunctive relief and the right to sue for past damages. A true and correct copy of the '093 Patent is Exhibit E to this Complaint.

67. UW has directly infringed, is currently directly infringing, and, on information and belief will continue to directly infringe one or more claims of the '093 Patent by making, using, offering to sell, and selling within the United States, or importing into the United States, the QR-Related Products.

68. SMS is informed and believes, and on that basis alleges, that UW has actively induced and encouraged and currently is actively inducing and encouraging infringement of the '093 Patent. SMS is informed and believes, and on that basis alleges, that the '093 Patent has been directly infringed, is currently being directly infringed, and will continue to be directly infringed within the United States – including, on information and belief, within this district – by UW's customers using the QR-Related Products. SMS is informed and believes, and on that basis alleges, that



1 UW actively encourages that infringement by advertising, promoting and instructing its  
2 customers in the use of these products in a manner that directly infringes the '093  
3 Patent. On information and belief, UW has actively induced and encouraged, or will  
4 continue to actively induce and encourage, its customers' use of these products in a  
5 manner that directly infringes the '093 Patent with specific intent to induce and  
6 encourage such infringement, or at a minimum with willful blindness to the known risk  
7 of such infringement.

8 69. SMS is informed and believes, and on that basis alleges, that UW has  
9 contributed and is currently contributing to the infringement of the '093 Patent by  
10 selling, offering to sell, supplying, maintaining, and supporting QR-Related Products  
11 that directly infringe the '093 Patent when used by UW's customers and their  
12 transaction partners. SMS is informed and believes, and on that basis alleges, that the  
13 '093 Patent has been directly infringed, is currently being directly infringed, and will  
14 continue to be directly infringed within the United States – including, on information  
15 and belief, within this district – by others, including UW's customers using QR-  
16 Related Products, mail recipients, and partners. These products are especially made or  
17 adapted for infringing use, and they are not staple articles or commodities of commerce  
18 suitable for substantial non-infringing use. On information and belief, UW has  
19 contributed, and will continue to contribute, to infringement of the '093 Patent with the  
20 knowledge that the systems and methods for which its products were especially made  
21 infringe the '093 Patent.

22 70. SMS is informed and believes, and on that basis alleges, that the claims  
23 directly or indirectly infringed by UW include, without limitation, Claims 1-5, 8-13,  
24 18-23, and 26-28 of the '093 Patent.

25 71. As a direct and proximate consequence of UW's infringement of the '093  
26 Patent, SMS has suffered and will continue to suffer damages, in an amount not yet  
27 determined, as well as irreparable injury for which it has no adequate remedy at law.  
28 SMS is entitled to damages from UW as well as preliminary and permanent injunctive

1 relief against further infringement of the '093 Patent.

2 72. UW has had actual notice of the '093 Patent and SMS's infringement  
3 contentions since at least August 18, 2015, but, despite such notice, has continued to  
4 infringe the '093 Patent. SMS is informed and believes, and on that basis alleges, that  
5 UW's infringement warrants treble damages or other enhanced damages as well as  
6 an award of SMS's attorneys' fees and litigation expenses.

7 **SIXTH CLAIM FOR RELIEF**

8 **(Infringement of U.S. Patent No. 8,910,860)**

9 73. SMS repeats and realleges the allegations of Paragraphs 1-32 as if fully  
10 set forth here.

11 74. On December 16, 2014, United States Patent No. 8,910,860 ("the '860  
12 Patent") was duly and legally issued, entitled "System and Method for Providing  
13 Information to a Recipient of a Physical Mail Object." SMS was assigned the '860  
14 Patent and continues to hold all rights, title, and interest in and to the '860 Patent,  
15 including, without limitation, all causes of action and enforcement rights and all rights  
16 to seek and obtain any remedies of any kind for past, current, and future infringement  
17 of the patent, including injunctive relief and the right to sue for past damages. A true  
18 and correct copy of the '860 Patent is Exhibit F to this Complaint.

19 75. UW has directly infringed, is currently directly infringing, and, on  
20 information and belief will continue to directly infringe one or more claims of the '860  
21 Patent by making, using, offering to sell, and selling within the United States, or  
22 importing into the United States, the pURL-Related Products.

23 76. SMS is informed and believes, and on that basis alleges, that UW has  
24 actively induced and encouraged and currently is actively inducing and encouraging  
25 infringement of the '860 Patent. SMS is informed and believes, and on that basis  
26 alleges, that the '860 Patent has been directly infringed, is currently being directly  
27 infringed, and will continue to be directly infringed within the United States –  
28 including, on information and belief, within this district – by UW's customers using the

1 pURL-Related Products. SMS is informed and believes, and on that basis alleges, that  
2 UW actively encourages that infringement by advertising, promoting and instructing its  
3 customers in the use of these products in a manner that directly infringes the '860  
4 Patent. On information and belief, UW has actively induced and encouraged, or will  
5 continue to actively induce and encourage, its customers' use of these products in a  
6 manner that directly infringes the '860 Patent with specific intent to induce and  
7 encourage such infringement, or at a minimum with willful blindness to the known risk  
8 of such infringement.

9 77. SMS is informed and believes, and on that basis alleges, that UW has  
10 contributed and is currently contributing to the infringement of the '860 Patent by  
11 selling, offering to sell, supplying, maintaining, and supporting pURL-Related  
12 Products that directly infringe the '860 Patent when used by UW's customers and their  
13 transaction partners. SMS is informed and believes, and on that basis alleges, that the  
14 '860 Patent has been directly infringed, is currently being directly infringed, and will  
15 continue to be directly infringed within the United States – including, on information  
16 and belief, within this district – by others, including UW's customers using pURL-  
17 Related Products, mail recipients, and partners. These products are especially made or  
18 adapted for infringing use, and they are not staple articles or commodities of commerce  
19 suitable for substantial non-infringing use. On information and belief, UW has  
20 contributed, and will continue to contribute, to infringement of the '860 Patent with the  
21 knowledge that the systems and methods for which its products were especially made  
22 infringe the '860 Patent.

23 78. SMS is informed and believes, and on that basis alleges, that the claims  
24 directly or indirectly infringed by UW include, without limitation, Claims 1-4, 7-13,  
25 16-18, 20-23, 25-27, and 29-30 of the '860 Patent.

26 79. As a direct and proximate consequence of UW's infringement of the '860  
27 Patent, SMS has suffered and will continue to suffer damages, in an amount not yet  
28 determined, as well as irreparable injury for which it has no adequate remedy at law.

1 SMS is entitled to damages from UW as well as preliminary and permanent injunctive  
2 relief against further infringement of the '860 Patent.

3 80. UW has had actual notice of the '860 Patent and SMS's infringement  
4 contentions since at least August 18, 2015, but, despite such notice, has continued to  
5 infringe the '860 Patent. SMS is informed and believes, and on that basis alleges, that  
6 UW's infringement warrants treble damages or other enhanced damages as well as  
7 an award of SMS's attorneys' fees and litigation expenses.

### 8 SEVENTH CLAIM FOR RELIEF

#### 9 (Infringement of U.S. Patent No. 9,105,002)

10 81. SMS repeats and realleges the allegations of Paragraphs 1-32 as if fully  
11 set forth here.

12 82. On August 11, 2015, United States Patent No. 9,105,002 ("the '002  
13 Patent") was duly and legally issued, entitled "System and Method for Providing  
14 Information to a Recipient of a Physical Mail Object." SMS was assigned the '002  
15 Patent and continues to hold all rights, title, and interest in and to the '002 Patent,  
16 including, without limitation, all causes of action and enforcement rights and all rights  
17 to seek and obtain any remedies of any kind for past, current, and future infringement  
18 of the patent, including injunctive relief and the right to sue for past damages. A true  
19 and correct copy of the '002 Patent is Exhibit G to this Complaint.

20 83. UW has directly infringed, is currently directly infringing, and, on  
21 information and belief will continue to directly infringe one or more claims of the '002  
22 Patent by making, using, offering to sell, and selling within the United States, or  
23 importing into the United States, the pURL-Related Products.

24 84. SMS is informed and believes, and on that basis alleges, that UW has  
25 actively induced and encouraged and currently is actively inducing and encouraging  
26 infringement of the '002 Patent. SMS is informed and believes, and on that basis  
27 alleges, that the '002 Patent has been directly infringed, is currently being directly  
28 infringed, and will continue to be directly infringed within the United States –

1 including, on information and belief, within this district – by UW's customers using the  
2 pURL-Related Products. SMS is informed and believes, and on that basis alleges, that  
3 UW actively encourages that infringement by advertising, promoting and instructing its  
4 customers in the use of these products in a manner that directly infringes the '002  
5 Patent. On information and belief, UW has actively induced and encouraged, or will  
6 continue to actively induce and encourage, its customers' use of these products in a  
7 manner that directly infringes the '002 Patent with specific intent to induce and  
8 encourage such infringement, or at a minimum with willful blindness to the known risk  
9 of such infringement.

10 85. SMS is informed and believes, and on that basis alleges, that UW has  
11 contributed and is currently contributing to the infringement of the '002 Patent by  
12 selling, offering to sell, supplying, maintaining, and supporting pURL-Related  
13 Products that directly infringe the '002 Patent when used by UW's customers and their  
14 transaction partners. SMS is informed and believes, and on that basis alleges, that the  
15 '002 Patent has been directly infringed, is currently being directly infringed, and will  
16 continue to be directly infringed within the United States – including, on information  
17 and belief, within this district – by others, including UW's customers using pURL-  
18 Related Products, mail recipients, and partners. These products are especially made or  
19 adapted for infringing use, and they are not staple articles or commodities of commerce  
20 suitable for substantial non-infringing use. On information and belief, UW has  
21 contributed, and will continue to contribute, to infringement of the '002 Patent with the  
22 knowledge that the systems and methods for which its products were especially made  
23 infringe the '002 Patent.

24 86. SMS is informed and believes, and on that basis alleges, that the claims  
25 infringed by UW include, without limitation, Claims 1-3, 6-10, 12-14, and 16-20 of the  
26 '002 Patent.

27 87. As a direct and proximate consequence of UW's infringement of the '002  
28 Patent, SMS has suffered and will continue to suffer damages, in an amount not yet

1 determined, as well as irreparable injury for which it has no adequate remedy at law.  
 2 SMS is entitled to damages from UW as well as preliminary and permanent injunctive  
 3 relief against further infringement of the '002 Patent.

4 88. UW has had actual notice of the '002 Patent and SMS's infringement  
 5 contentions since at least August 18, 2015, but, despite such notice, has continued to  
 6 infringe the '002 Patent. SMS is informed and believes, and on that basis alleges, that  
 7 UW's infringement warrants treble damages or other enhanced damages as well as  
 8 an award of SMS's attorneys' fees and litigation expenses.

#### 9 **RELIEF REQUESTED**

10 SMS requests the following relief:

- 11 1. Judicial determinations and declarations that UW has directly infringed,  
 12 and continues to directly infringe, each of SMS's patents in suit (U.S. Patents Nos.  
 13 7,814,032, 7,818,268, 8,073,787, 8,260,269, 8,429,093, 8,910,860, and 9,105,002);
- 14 2. Judicial determinations and declarations that UW has induced, and  
 15 continues to induce, infringement of each of SMS's patents in suit;
- 16 3. Judicial determinations and declarations that UW has contributorily  
 17 infringed, and continues to contributorily infringe, each of SMS's patents in suit;
- 18 4. Preliminary and permanent injunctions prohibiting UW, its subsidiaries,  
 19 officers, agents, servants, employees, and licensees, and all persons or entities acting or  
 20 attempting to act in active concert or participation with them, or acting on their behalf,  
 21 from infringing any of SMS's patents in suit;
- 22 5. An order requiring that UW notify all of its customers, vendors and users  
 23 of the infringement and their participation in it, recall all infringing products, and cause  
 24 and encourage its customers, vendors, and users to cease infringing;
- 25 6. Judgment for all damages caused by UW's infringement and for not less  
 26 than a reasonable royalty for all such infringement, in accordance with 35 U.S.C.  
 27 Section 284;

1           7.     Treble damages, or other enhanced damages, under 35 U.S.C. Section  
2 284;

3           8.     That this be declared an exceptional case, and that UW be awarded its  
4 attorneys' fees and litigation expenses under 35 U.S.C. Section 285;

5           9.     That UW be awarded its costs of suit;

6           10.    Pre-judgment and post-judgment interest on all damages and other  
7 amounts awarded to UW; and

8           11.    Such other and further relief as the Court deems just and proper.  
9

10 Dated: September 25, 2015

Respectfully submitted,

11  
12 **One LLP**

13 /s/ William O'Brien

14 William J. O'Brien

15  
16 *Attorneys for Plaintiff,*  
17 *Secured Mail Solutions, LLC*  
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**JURY DEMAND**

Under Rule 38(b) of the Federal Rules of Civil Procedure, SMS requests a trial by jury on all issues properly triable by jury.

Dated: September 25, 2015

Respectfully submitted,

**One LLP**

/s/ William O'Brien

William J. O'Brien

*Attorneys for Plaintiff,  
Secured Mail Solutions, LLC*

**EXHIBITS TO COMPLAINT**

- A. U.S. Patent No. 7,814,032
- B. U.S. Patent No. 7,818,268
- C. U.S. Patent No. 8,073,787
- D. U.S. Patent No. 8,260,629
- E. U.S. Patent No. 8,429,093
- F. U.S. Patent No. 8,910,860
- G. U.S. Patent No. 9,105,002
- H. Letter dated August 17, 2015, from One LLP to Universal Wilde, Inc.